

October 1, 1971

Mr. Joseph A. Lehmann
Vice President, Norton
Corrosion Limited, Inc.
22327 - 89th Avenue
Woodinville, Washington 98072

Dear Joe:

In reply to your letter of September 24, I believe the best way to give you a definition of "active corrosion" would be to refer you to Section 192.457(c) of the corrosion regulations. Here we have defined active corrosion as meaning, "continuing corrosion which, unless controlled, could result in a condition that is detrimental to public safety."

As you know, Joe, any uncoated ferrous pipe will have some surface corrosion by the time it is buried. This is not to be considered as active corrosion. What we are talking about basically is where corrosion is found to be taking place as determined, for example, by a pipe-to-soil potential survey or a surface potential survey for locating "hot spots." However, those areas where an electrical survey cannot be made (Section 192.465(e)), the operator shall determine the presence of active corrosion by a study of leak history records, a leak detection survey or any other means that would give him knowledge as to where pipe has been failing due to corrosion.

In the above last referenced sections, you will note that we stress that active corrosion should be determined by an electrical survey as a first choice. If this is not practical then the other means shall be used to determine where corrosion is taking place.

It was nice hearing from you, Joe. I trust this information will be helpful.

Sincerely,

Lance F. Heverly
Assistant Chief
Technical Division
Office of Pipeline Safety

P.S. I plan to be coming through Seattle late afternoon on October 7, in route to Anchorage. I will give you a call while at the airport.

NORTON CORROSION LIMITED, Inc.

September 24, 1971

Mr. Lance F. Heverly, P.E.
Assistant Chief-Technical Division
Office of Pipeline Safety
Department of Transportation
800 Independence Avenue, S.W.
Washington, D.C. 20590

Subject: 49 CFR Part 192
OPS Interpretation "Active Corrosion"

Dear Lance:

I'm certain that you have been inundated with questions concerning the new Minimum Federal Safety Standards for Natural Gas Pipelines. We certainly don't wish to add to your burdens, however we have one question which seriously effects our work on natural gas systems.

The rules state--Cathodic protection of most existing lines is now required only in "areas in which active corrosion is found", eliminating any implication that an operator must cathodically protect the pipeline in all areas of existing corrosion, even where the operator has not been able to detect it.

It would be very helpful if OPS could clarify this. In particular, a specific definition of "active corrosion" would be of significant help.

Lance, you can no doubt appreciate the fact that our engineers are continuously placed in the position of rendering a decision with respect to "active corrosion." Many clients are naturally interested in the possibility of omitting cathodic protection where "active corrosion" is not prevalent. The difficulty arises in determining officially where "active corrosion" starts and stops.

Perhaps my question has already been answered in the various explanations issued by the OPS. Is so, please direct me to the appropriate publication.

We sincerely appreciate any assistance you can give us on this matter.

I hope that this letter finds everything well with you.

Best personal regards.

Sincerely,

NORTON CORROSION LIMITED, INC.

Joseph A. Lehmann, Vice President

P.S. If your travels bring you to the Northwest, please "look us up". We would certainly enjoy a visit with you.

Regards,

Joe